

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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|---------------------------------|---|-------------------------------|
| CHRIS MARTIN, |) | CASE NO. 1:23-cv-02312 |
| |) | |
| Plaintiff, |) | JUDGE CHARLES E. FLEMING |
| |) | |
| v. |) | DEFENDANT CLEVELAND |
| |) | CITY COUNCIL'S MOTION |
| CLEVELAND CITY COUNCIL, et al., |) | FOR LEAVE TO ANSWER OR |
| |) | OTHERWISE RESPOND TO |
| Defendants. |) | PLAINTIFF'S COMPLAINT |

Defendant Cleveland City Council moves this Court for an Order granting it an extension of time, until February 5, 2024, in which to answer or otherwise respond to Plaintiff's Complaint.

Prior to today, Plaintiff tendered a waiver of service to co-Defendant Blaine Griffin (also represented by the undersigned counsel), Griffin accepted the requested waiver, and Plaintiff filed the waiver. *See* [Doc 5]. As a result, Defendant Griffin's deadline to answer, plead, or otherwise respond to Plaintiff's Complaint is Monday, February 5, 2024, given 60 days from December 5, 2023 is Saturday, February 3, 2024. *See* Fed.R.Civ.P. 6(a)(1)(C). Defendant Cleveland City Council needs a similar extension of time to investigate and respond to the pleading. This Court has not previously granted Defendant Cleveland City Council an extension of time regarding its response to Plaintiff's Complaint.

Therefore, Defendant Cleveland City Council respectfully seeks leave to respond to Plaintiff's Complaint on or before Monday, February 5, 2024.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies he electronically filed the above document on this 14th day of December, 2023. The Court's electronic filing system will send notice of the filing to all parties. Parties may access the filing through the Court's filing system.

s/William M. Menzalora
WILLIAM M. MENZALORA